

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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October 26, 2022

*Via ECF*

The Honorable George B. Daniels  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1310  
New York, NY 10007

SO ORDERED:

  
George B. Daniels, U.S.D.J.

Dated: OCT 27 2022

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Daniels:

I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to request that the Court approve filing dates for a response and a reply in connection with the Rule 72 Objections to Magistrate Judge Sarah Netburn's Order Imposing Sanctions on Kreindler & Kreindler LLP, which Kreindler & Kreindler LLP ("Kreindler & Kreindler") filed on October 25, 2022, as ECF No. 8681.

Saudi Arabia requests a due date for its response of November 15, 2022. Kreindler & Kreindler has stated that it does not object to this date provided that Saudi Arabia agrees that Kreindler & Kreindler's reply should be due on December 1, 2022, one week before the scheduled oral argument. Saudi Arabia agrees to that due date. We respectfully request that the Court approve those dates.

As the Court is aware from previous letters, the parties have contested whether leave of Court is required for a response to Rule 72(a) objections, and it is Saudi Arabia's position that no leave is required. *See* ECF No. 4753, at 1-2 & n.\*. To the extent necessary, Saudi Arabia respectfully requests leave to file its response.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable George B. Daniels  
October 26, 2022  
Page 2

Although we have submitted past proposed schedules for Rule 72 objections to Judge Netburn, we are submitting this request to Your Honor because Your Honor has already scheduled an oral argument on Kreindler & Kreindler's Rule 72 objections.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)